

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

WAYNE BERRY, a Hawaii citizen,)	CIVIL NO. CV03-00385 SOM-LEK
)	(Copyright)
Plaintiff,)	AFFIDAVIT OF SONIA PURDY
v.)	
)	
HAWAIIAN EXPRESS SERVICE,)	
INC., et al.)	
)	
Defendants.)	
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AFFIDAVIT OF SONIA PURDY

STATE OF HAWAII)
) SS.
CITY AND COUNTY OF HONOLULU)

SONIA PURDY, being first duly sworn under oath deposes and says as follows:

1. I am a named Defendant in this case. I was a former salaried employee with the logistics Department of C&S Wholesale Grocers, Inc.'s Hawaii Division ("C&S") in Kapolei, Hawaii.

2. My job title at C&S was Data Entry Clerk. My duties and responsibilities consisted of entering information provided by Hawaiian Express on purchaser orders received, setting appointments for Hawaiian Express on a daily basis for incoming C&S purchase orders, billing customers for transportation or freight fees, and general filing. I used the computer at work simply for data entry.

3. I had no decision-making authority in my position as Customer Service Representative. My superiors included Teresa Noa and Brian Christensen. I did not have any authority or control over what type of computer software or programs were used by C&S.

4. I have no education, training, experience, or background in computer programming. I have never made any functional or other changes to the spreadsheets or any of the computer programs at C&S. I have never made any functional or other changes to Wayne Berry's Freight Control System or any other program developed by him.

5. I have never received any bonuses or additional compensation for the development of any computer software at C&S.

6. I have never used Plaintiff's Freight Control System after June 9, 2003, when the company shifted to using Excel Spreadsheets.

7. Prior to my employment at C&S, I was a salaried employee with Fleming Companies, Inc. ("Fleming"). I was employed at Fleming from May, 1997 to September, 2003. My job title was Customer Service Clerk and my duties and responsibilities were virtually the same as they were at C&S. I

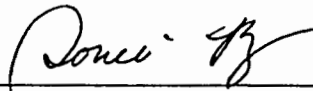
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have never received any bonuses or additional compensation for the development of any computer software at Fleming.

FURTHER AFFIANT SAYETH NAUGHT.



SONIA PURDY

Subscribed and sworn to before me
this 23rd day of February 2005.



Notary Public, State of Hawaii
My Commission Expires: 4-9-2008
Print Name: Danilo W. Hosoda

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